



August 22, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 12-268
Notice of Ex Parte Meeting

American Tower Corporation ("ATC"), by its counsel, hereby provides notice of a telephonic meeting on August 20, 2013 involving the persons identified below:

- Peter Starke, Vice President, Broadcast, ATC;
- James Stenberg, Broadcast Account Manager, ATC;
- Michelle Carey, Deputy Chief, Media Bureau;
- Rebecca Hanson, Senior Advisor/Special Counsel, Media Bureau;
- Barbara Kreisman, Chief, Video Division, Media Bureau;
- Dorann Bunkin, Media Bureau;
- Kim Matthews, Media Bureau;
- John Gabrysch, Media Bureau;
- Evan Morris, Media Bureau; and
- Mary Margaret Jackson, Media Bureau.

The parties generally discussed the impact of band repacking on tower infrastructure. In particular, ATC discussed the following issues:

- Contractual Relationship with TV Stations:
 - Band repacking will require review of existing lease terms which may trigger amending terms and licensees moving to a new location will need to enter into lease negotiations with the tower owner;
 - Lease terms vary from lease to lease but generally contain language very specific to the Lessee's frequency, power, mounting configuration, antenna/line weight, and wind load;
 - Most leases do not contain early termination rights and thus this will need to be worked out between the parties if repack prevents licensees from operating at their current transmitter facilities.

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- Tower Structural Issues Under Rev. G
 - Changes to a tower's existing equipment load will trigger a structural analysis;
 - Many areas require towers to be upgraded to Rev. G if new antennas are added;
 - Older towers may require extensive and costly modifications or not be capable of being upgraded to Rev. G, requiring the construction of a new tower.
- Single Frequency Antenna vs. Shared Broadband Antennas
 - Majority of existing TV antennas are single frequency;
 - Broadband antennas can be used by multiple users and, therefore, could be used to reduce the cost of repacking.
- RF Exposure Rules May Impact Timing
 - RF exposure rules for climbers working on antenna changes and the finite number of qualified climbers may impact the timing for making the aforementioned changes.
 - In order to maintain compliance with RF exposure rules, current broadcast operations at certain sites may have to be powered down or temporarily taken off the air in order to allow licensees impacted by the repack to install their antennas. In addition, because incumbent broadcast licensees providing service from a tower cannot be off the air or operate at reduced power for a significant time period, antenna replacement work may need to be staged over an extended period of time.

If you have any questions concerning this notice, please contact the undersigned.

Respectfully submitted,



Peter Starke
Vice President, Broadcast

cc: Michelle Carey
Rebecca Hanson
Barbara Kreisman
Dorann Bunkin
Kim Matthews
John Gabrysch
Evan Morris
Mary Margaret Jackson